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**WASHINGTON STATE EMPLOYEES
CREDIT UNION**

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NATHAN THEW,

Plaintiff,

v.

WASHINGTON STATE
EMPLOYEES CREDIT UNION,

Defendant.

CASE NO.: 5:19-cv-00308-JFW-SP

**NOTICE OF MOTION AND MOTION
TO DISMISS**

Hearing Date: July 8, 2019
Time: 1:30 p.m.
Courtroom: 7A
District Judge: Hon John F. Walter
Complaint Filed: February 20, 2019
Trial Date: Not Set

[Filed concurrently with Memorandum of
Points and Authorities; Declaration of
Paul Kirkbride; and [Proposed] Order]

NOTICE IS HEREBY GIVEN that on July 8, 2019 at 1:30 p.m., or as soon thereafter as the matter may be heard in Courtroom 7A of the above-entitled court located at 350 W. 1st Street, Los Angeles, California 90012, Defendant WASHINGTON STATE EMPLOYEES CREDIT UNION (“WSECU” or the “Credit Union”) will move the Court for a motion to dismiss without leave to amend Plaintiff Nathan Thew’s (“Plaintiff”) complaint pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(2), 12(b)(3), and 12(b)(6).

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1 This motion is based on the grounds that (1) Plaintiff lacks standing; (2) the
2 Court does not have personal jurisdiction over the Credit Union; (3) Plaintiff filed
3 his case in the wrong venue; and (4) Plaintiff fails to state a claim for violation of
4 the California Consumer Credit Reporting Agencies Act.

5 This motion is based on this Notice of Motion, the Memorandum of Points
6 and Authorities, the Declaration of Paul Kirkbride, as well as such other evidence
7 and/or arguments that the Court may allow at the time of the hearing on the motion.

8 This motion is made following multiple conferences of counsel pursuant to
9 Local Rule 7-3, which took place on May 22, May 29, and June 3, 2019.

10 **PETTIT KOHN INGRASSIA LUTZ & DOLIN PC**
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12 Dated: June 7, 2019 By: /s/ Douglas A. Pettit
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14 Erik T. Johnson, Esq.
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